

EXHIBIT 5



Sequoia Union High School District
Uniform Complaint Procedures
COMPLAINT FORM

I. Your Contact Information

Last Name: Kasle First Name: Sam

Address: [REDACTED] Apt. #:

City: [REDACTED] State: [REDACTED] Zip: [REDACTED]

Home Phone: [REDACTED] Work or Cell Phone: [REDACTED]

Email: [REDACTED]

II. Complainant

You are filing this complaint on behalf of: [REDACTED] Kasle and Family

☒ Parent/Guardian ☐ Pupil ☐ Witness to the Incident ☐ Other:

III. School Information

School Name: Woodside High School

Grade: 10 Principal: Karen Van Putten

IV. Basis of the Complaint

A. District violation of state or federal law or regulations/policies governing:

- | | |
|---|---|
| <input type="checkbox"/> Accommodations for Pregnant and Parenting Pupils | <input type="checkbox"/> Every Student Succeeds Act / No Child Left Behind (Titles I–VII) |
| <input type="checkbox"/> Adult Education | <input type="checkbox"/> Local Control and Accountability Plans (LCAP) |
| <input type="checkbox"/> After School Education and Safety | <input type="checkbox"/> Migrant Education |
| <input type="checkbox"/> Agricultural Career Technical Education | <input type="checkbox"/> Physical Education Instructional Minutes |
| <input type="checkbox"/> Career Technical and Technical Education; Career Technical; Technical Training (State) | <input type="checkbox"/> Pupil Fees |
| <input type="checkbox"/> Career Technical Education (Federal) | <input type="checkbox"/> Reasonable Accommodations to a Lactating Pupil |
| <input type="checkbox"/> Child Care and Development | <input type="checkbox"/> Regional Occupational Centers and Programs |
| <input type="checkbox"/> Compensatory Education | <input type="checkbox"/> School Plans For Student Achievement |
| <input type="checkbox"/> Course Periods without Educational Content | <input type="checkbox"/> School Safety Plans |
| <input type="checkbox"/> Education Of Pupils In Foster Care, Pupils Who Are Homeless, Former Juvenile Court Pupils Now Enrolled In A School District, and Pupils Of Military Families | <input type="checkbox"/> School Site Councils |
| | <input type="checkbox"/> State Preschool |
| | <input type="checkbox"/> State Preschool Health And Safety Issues In LEAs Exempt From Licensing |

B. Unlawful discrimination, including discriminatory harassment, intimidation, or bullying, based on actual or perceived characteristics of the following:

- ☐ Age (age 40+ in employment)
 - ☐ Ancestry
 - ☐ Breastfeeding Students
 - ☐ Color
 - ☐ Physical or Mental Disability
 - ☐ Ethnic Group Identification
 - ☐ Gender Expression
 - ☐ Gender Identity
 - ☐ Gender
 - ☐ Genetic Information
 - ☐ Marital or Parental Status
 - ☐ Nationality
 - ☐ National Origin
 - ☐ Race or Ethnicity
 - ☐ Religion
 - ☐ Sex
 - ☐ Sexual Harassment (Title IX)
 - ☐ Sexual Orientation
 - ☐ Association with any of these actual or perceived characteristics

C. Allegations of noncompliance of the following:

- ☐ Student bullying that is not based on the above listed protected classes
- ☐ Retaliation against a complainant or other participant in the complaint process or anyone who has acted to uncover or report a violation subject to the uniform complaint procedures

D. Expulsion Appeal:

- ☐ If you are appealing an expulsion, list the date of the District's decision to expel: _____
(Please attach all District expulsion documentation to your complaint)

V. Details of Complaint

Please answer the following questions to the best of your ability. Attach additional sheets of paper if you need more space.

Please **describe** the type of incident(s) you experienced that led to this complaint, in as much detail as possible, including all dates and times when the incident(s) occurred or when the allege acts first came to your attention and location(s) where the incident(s) occurred:

Please see attached documents.

[illegible]

List the **individuals** involved in the incident(s) complained of:

Please see attached documents.

List any **witnesses** to the incident(s):

Please see attached documents.

What steps, if any, have you taken to resolve this issue before filing a complaint?

Please see attached documents.

I understand that the District will maintain the confidentiality of this information, to the extent provided by law or the applicable collective bargaining agreement; that I will be protected from retaliation for filing this complaint; that the District may request further information about this matter; and if such information is available, I agree to present it upon request.

I understand that with the exception of pupil fee complaints, which may be filed within one (1) year of the alleged violation, all other complaints must be filed within six (6) months of the alleged occurrence. Pupil fees and LCAP complaints may be filed anonymously.

I believe that the forgoing is true and correct.

Note: I understand that if I file a complaint right before Thanksgiving Recess, Winter Recess, Spring Recess or Summer Recess, that school staff will be on vacation and it will take longer to investigate; and I agree to extend the timeline for responding to my complaint by the number of days schools are closed. Initials SK

Signature of Person Filing Complaint

2/1/2024

Date

Please submit this complaint to:

Assistant Superintendent of Human Resources
Human Resources Department
480 James Avenue
Redwood City, CA 94062

Faculty Complaint

█████ Kastle was a tenth grade student at Woodside High School in the beginning of the 2023-2024 academic year. █████'s World History teacher, Greg Gruszynski, wore a "Bike for Palestine" t-shirt on one of the first days of school, hung a "Free Palestine" poster on the wall, and introduced the topic of the Hamas-Israel conflict the week of October 7, 2023, by stating, "I want to talk about something happening now that is bad. He then wrote on the board, "Israel's Attack on Gaza," and began describing Israel's Defense Forces' military attack against Hamas in Gaza. █████ knew what was happening in the Middle East as she is Jewish—in fact, she was the only engaged Jewish student in that 10th grade World History class—and she and her family had been paying close attention to what was happening in the Middle East since early Saturday morning, October 7. █████ was frustrated because she knew the teacher was inaccurately presenting the conflict, in fact, he didn't even mention the October 7 Hamas massacre of approximately 1200 Israelis. She finally raised her hand and asked, "Who attacked first?" And though Mr. Gruszynski admitted that it was Hamas, throughout the time that he taught this topic he constantly downplayed any culpability by Hamas and either ignored or downplayed any efforts on the part of Israel to solely focus on eradicating the terrorist organization, Hamas, as well as the return of the hostages taken on Oct 7th and instead presented Israel's self-defensive actions as wanton violence and the intentional targeting of Palestinian civilians.

Mr. Gruszynski repeated, as if fact, claims that Israel caused the Gaza Strip to exist as an "open air prison that Israel controls," and showed multiple videos, all from NPR's "Democracy Now" show which is notoriously anti-Israel. Once, in early December, Mr. Gruszynski began his discussion of "Israel-Palestine" with the comment, "█████ is someone who doesn't think Israel is an Apartheid state," with an intonation that made it clear such a position is ridiculous, and continued with, "maybe now others will think differently," meaning it was his intention to show the rest of the students in the class that █████ is wrong. █████ was humiliated by Mr. Gruszynski's ridiculing of her position, and she was also mortified that the teacher was describing her people as monsters. But even the most violent acts of Hamas were never criticized by this teacher. In fact, Mr. Gruszynski told the class that the U.S. and Israel labeled Hamas as a terrorist

organization, but, he asked out loud, “how different is Israel from Hamas?” Mr. Gruszynski described Hamas, rather, as a “political party that fights against Israel.” He also taught this 10th grade World History class that Palestine is a state founded and recognized by the United Nations in 1947, which is patently false.

The Israeli checkpoints set up at border crossings were described by Mr. Gruszynski to his 10th grade class as tools solely to humiliate the Palestinians. When [REDACTED] raised her hand and asked isn’t it the case that the checkpoints are there because of terrorism? Mr. Gruszynski’s response was “that’s the reason they [Israelis] give.” [REDACTED] continued trying occasionally to point out when Mr. Gruszynski stated inaccuracies, but she eventually gave up as she had the feeling that the teacher was enjoying the game of his words taunting her and her efforts to help fairly educate the other students; with such a power differential, however, [REDACTED] found nothing funny or engaging about it.

The instructional materials gathered and distributed to [REDACTED]’s 10th grade World History class repeatedly asserted that the Palestinians—not the Jews—are indigenous to the land of Israel, despite historical, archeological and genetic proof to the contrary.

When [REDACTED] would complain about Mr. Gruszynski’s bias against the Jewish State, he often responded that “he used to teach Jews in New York,” as if that made it okay for him to be antisemitic.

The only videos Mr. Gruszynski used in the class (aside from the antiquated “Promises” movie that was released 23 years ago in 2001 - three years before Israel left Gaza and four years before Hamas was voted in by the Palestinian people to lead their government) on the “Israel-Palestine” unit were four or more videos from Democracy Now. There was never any effort to do anything but prove, through the materials Mr. Gruszynski handed out in class or through his oral presentations, that Israel was always in the wrong. [REDACTED] is convinced that anyone who didn’t know much about what is actually happening in the Middle East and only

learned about it from Mr. Gruszynski's class would come away from the class not with a balanced or nuanced perspective, but with absolute certainty that Israel is evil and while unstated that Jews themselves are evil.

Due to the environment at Woodside during this time and from past anti-semitic experiences at Woodside, both [REDACTED] and her older sister [REDACTED] (a Woodside senior) stopped wearing their always-present Star of David necklaces for fear of being singled out, harassed and even attacked.

There were three questions that dealt with the Israel-Palestine unit on the final exam for the semester. [REDACTED] knew that she had to write her answers to those questions the way Mr. Gruszynski wanted, which was to cast Israel as the wrongdoer. She said that if she were to write what she genuinely knew to be true Mr. Gruszynski would have failed her. In other words, that teacher forced a Jewish student to write bad things about Israel, and by extension her own people, in order to get a good grade.

Mr. Gruszynski's biased and discriminatory teaching violates numerous California Education Code policies including §§60045, 49091.12, 51500, 60045(a), 220.